



# BOARD OF SUPERVISORS COUNTY OF MADERA

MADERA COUNTY GOVERNMENT CENTER  
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BONNIE HOLIDAY, Clerk of the Board

File No: 03119

Tape No: 1-60

Date: September 16, 2003

In the Matter of CONSIDERATION OF APPROVAL OF LETTER TO THE BUREAU OF RECLAMATION REGARDING COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT ON THE MENDOTA POOL 10-YEAR EXCHANGE AGREEMENTS, WATER OVERSIGHT COMMITTEE.

Upon motion of Supervisor Dominici, seconded by Supervisor Gilbert, it is ordered that the attached be and it is hereby adopted as shown.

I hereby certify that the above order was adopted by the following vote, to wit:

AYES: Supervisors Bigelow, Moss, Dominici, Silva and Gilbert.  
NOES: None.  
ABSTAIN: None.  
ABSENT: None.

Distribution:

Auditor  
CAO  
County Counsel  
Bureau of Reclamation  
Water Oversight Committee  
Tanna Boyd  
San Joaquin River Task Force  
Madera Irrigation District

ATTEST: BONNIE HOLIDAY, CLERK  
BOARD OF SUPERVISORS

By

*Stacy Miller*  
Deputy Clerk



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September 17, 2003

Mr. David Young  
U.S. Department of Interior  
South-Central California Area Office  
1243 "N" Street  
Fresno, California 93721-1813

Dear Mr. Young:

On September 16, 2003 the Madera County Board of Supervisors voted to approve the attached comments regarding the draft Environmental Impact Statement for the Mendota Pool 10-Year Exchange Agreement. The Madera County Board of Supervisors believes these comments are crucial to the accuracy of the Environmental Impact Statement.

If you have any questions please do not hesitate to contact our office.

Sincerely,

A handwritten signature in black ink, reading "Vern D. Moss".

VERN D. MOSS  
Chairman

VDM/tgb

Enclosure

cc: Madera County Water Oversight Committee

### **Mendota Pool 10-Year Exchange Agreements – Draft EIS**

Possible comments regarding the draft EIS. Comments are due September 29, 2003.

#### **General Comments**

1. Data from the 2002 Mendota Pool pumping program is not included in the DEIS. Representatives of the MPG assured Madera County representatives prior to the completion of the DEIS that the 2002 data would be included in the analysis.
2. The lack of data from 2002 results in a failure to identify subsidence which has significantly exceeded expectations and targeted maximums in prior environmental documentation.
3. The DEIS states that there is no groundwater overdraft in the area, but this was not supported. Water-level hydrographs for the shallow aquifer (above the A-clay) indicate a lack of water-level recovery in recent years, coincident with heavier pumping of shallow wells by the MPG. In addition, the Mendota area is upgradient of and hydraulically connected to the Madera area, which is a well-known area of groundwater overdraft.
4. Pumpage of about 270,000 acre-feet of water by the MPB over a 10-year period would intercept water that would otherwise be available as recharge to locally overdrafted areas and likely increase the overdraft in the Madera area by an average of about 27,000 acre-feet per year, which is not insignificant. The DEIS doesn't address this topic at all, but rather focuses on localized seasonal drawdowns.
5. The DEIS references a "Settlement Agreement" which contains provisions for certain specified landowners in Madera County to be paid for impacts to groundwater levels and pumping costs. There are no mitigation provisions for ensuring compensation for all landowners whose groundwater levels and pumping costs are impacted.
6. The MPG has gradually begun to admit that much of their sustainable pumping is from shallow wells that tap seepage from the Mendota Pool. The DEIS doesn't address where this seepage would have otherwise gone, if it was not pumped by the MPG. The impact of the loss of about 270,000 acre-feet of excellent quality recharge in the Mendota area wasn't clearly addressed in the DEIS. Instead, the DEIS infers that there would be little short-term impact on the groundwater quality in areas east of the Fresno Slough. However, the long-term impact of the loss of the 270,000 acre-feet of recharge of good quality water on groundwater near and north

of the San Joaquin River, particularly in Columbia Canal Co. and Newhall L&F lands, wasn't addressed.

7. Part of the Appendix D (model descriptions) discussion is difficult to understand and not well substantiated, such as "the seepage factor." The clustering of wells whereby CCID wells and the older City of Mendota wells were grouped together is inappropriate, when considering the cause of the past water quality degradation of the city wells, which was not due to CCID pumpage.
8. The preparers of the hydrogeologic parts of the DEIS weren't identified. A California certified hydrogeologist should stamp the reports and/or appendices.
9. Influences of rising water levels in Westlands Water District in recent years and agricultural drainage on the northeasterly gradient and movement of poor quality groundwater weren't discussed.

#### Specific Comments

Page 2-2	<p>First sentence, last paragraph: "for a "normal" year in which 31,000 acre-feet would be pumped."</p> <p>Everywhere else in document the number is 31,600.</p>
Page 2-5	<p>2.1.1.4 Monitoring Program, fourth bullet point: "Evaluate data from continuous EC recorders located at the DMC, the Exchange Contractors' intakes, and the MWA at regular intervals."</p> <p>What is a regular "intervals?"</p> <p>It is unclear if that is consistent with 2.1.1.3 Program Design Constraints Bullet point 2: "Shut off MPG wells if electrical conductivity (EC) measurement at the Exchange Contractors' canal intakes exceed that of the DMSC by 90 umhos/cm for a period of three days or more?"</p>
Page 2-7	<p>2.1.2.2 Land following fifth sentence: Fallowed land requires approximately 0.5 acre-foot of water per year for weed suppression activities."</p> <p>We are not aware that this has been considered part of "crop water" demand by DWR or Bureau. If the Bureau agrees to this water requirement for fallow land, then revisions to a significant number of CVP water needs analyses and Water Management Plans will be required.</p>

<b>Page 3-19</b>	<p>Last paragraph of 3.4.2.3 states: MPG pumping from the deep Zone is therefore unlikely to cause significant seepage from the San Joaquin River.</p> <p>What about shallow zone pumping?</p>
<b>Figure 3-10</b>	<p>These types of maps are somewhat misleading. Although it isn't stated, it is assumed the contours are from MSL Groundwater in the 80's MSL depression is 80-100 feet deep.</p> <p>Where is the 100 feet MSL contour NE of Madera, it's 240-250 feet to standing water.</p>
<b>Page 4-1</b>	<p>Last paragraph "Drawdown due to pumping would also result in an increase in the hydraulic gradient, thereby increasing the flow of groundwater from outlying areas toward the Mendota pool.</p> <p>This could be considered export of Madera County groundwater requiring a Madera County groundwater export permit.</p>
<b>Page 4.2</b>	<p>4.1.1.1 Second paragraph "There are no shallow water supply wells other than MPG wells within the study area. Therefore, short-term drawdowns caused by MPG shallow pumping during normal years would not cause water level impacts to other users.</p> <p>It would cause water impacts, if there is hydraulic continuity to the pool. Thus requiring more surface water to the pool to "in essence" be pumped back into the pool.</p>
<b>Page 4-6</b>	<p>4.1.3 Under this alternative, a maximum of 9,000-acre feet per year could be exchanged with other users around their pool. "Could" should be changed to "would."</p>
<b>Page 4-17</b>	<p>Second paragraph: The predicted salinity increase at the shallow MPG wells during the proposed action is considered a significant impact.</p> <p>This would indicate potential long-term degradation in the pool</p>
<b>Page 4-18</b>	<p>4.3.4 Last sentence: This would probably cause additional groundwater quality degradation near the pool, not confined to "shallow" wells?</p>
<b>Page 4-24</b>	<p>4.4.13: 3 day rule on EC. Program doesn't indicate who is monitoring this daily. Only daily recorders and review at regular intervals, whatever that is?</p>



**Response to Comments from  
Madera County Board of Supervisors**

**General Comments**

**Comment 1**

**Response:** Data from the 2002 monitoring program were included in the draft EIS to the extent they were available at the time the document was being prepared. The draft EIS contains evaluation of most of the 2002 data including groundwater quality, groundwater levels, surface water quality, and sediment quality. 2002 MPG pumpage data were included in the groundwater flow and quality models discussed in Section 4.3.1 and Appendix D. 2002 and 2003 pumpage totals have been added to Table 1-2 in the final EIS. 2002 compaction data are evaluated in the final EIS.

**Comment 2**

**Response:** Compaction data from the Yearout Ranch extensometer were not provided to the MPG until July 2003. The 2002 compaction data were analyzed for the draft 2002 Annual Report and show that inelastic compaction at Yearout Ranch was much less than in 2001. Compaction measured during the 3-year period of record (2000-2002) has not exceeded expectations at either extensometer. Data contained in the draft 2002 Annual Report indicate that the cumulative inelastic compaction during the 2000-2002 period was about 0.006 foot at the Fordel extensometer and 0.046 foot at the Yearout Ranch extensometer. Model results indicate that MPG transfer pumping was responsible for 0.014 foot of the inelastic compaction at the Yearout Ranch extensometer. This is within the limits specified in the Settlement Agreement and the draft EIS (an average of 0.005 foot per year).

**Comment 3**

**Response:** See response to Specific Comment paragraph 5, No. 2 from the SJREC (page F-74).

**Comment 4**

**Response:** See response to Specific Comment paragraph 5, No. 3 from the SJREC (page F-75).

**Comment 5**

**Response:** The Settlement Agreement is the result of litigation between the SJREC and NLF, and the MPG. As part of that agreement, the MPG agreed to compensate SJREC and NLF for increased pumping costs that were directly attributable to MPG transfer pumping. These parties have developed an approach to determining fair compensation, based on the exchange of data and the use of the groundwater model to estimate the increased pumping cost due to drawdowns caused by MPG transfer

pumping. In 2001 and 2002, the majority of the compensation was paid to NLF and CCC because of the proximity of some of their deep wells to the deep MPG wells in FWD. Compensation to owners of more distant wells was small because the majority of the drawdown caused by transfer pumping did not extend far beyond the vicinity of the MPG wells. As stated in Section 4.1.1.1 of the EIS, compensation will be paid to well owners who are not parties to the Settlement Agreement at their request and will be calculated similarly. The City of Mendota and Mendota Biomass provided 2002 pumpage data and will be compensated. 2002 pumpage data were also requested from all growers in Aliso Water District east of the Chowchilla Bypass in Madera County so that compensation could be calculated. Only one grower provided data, but the grower's wells were so far away from the MPG wells that the calculated compensation was negligible. The compensation calculations will be repeated for each year of the 10-year proposed action, and well owners who provide monthly pumpage data for their wells by January 31 of the following year will be included in the calculations.

**Comment 6**

**Response:** See response to Specific Comment paragraph 5, No. 4 from the SJREC (page F-75).

**Comment 7**

**Response:** See response to Specific Comment paragraph 5, No. 5 from the SJREC (page F-75).

**Comment 8**

**Response:** See response to Specific Comment paragraph 5, No. 1 from the SJREC (page F-74).

**Comment 9**

**Response:** See response to Overview Comment paragraph 3, bullet 7 from the SJREC (page F-67).

**Specific Comments****Page 2-2**

**Response:** The text has been clarified. During a normal year, the MPG could conduct up to 31,600 acre-feet of transfer pumping. However, due to the design constraints on the pumping program, the actual amount would typically be less. Simulations conducted with the groundwater flow and quality models indicated that the maximum amount that could be pumped during the 10-year proposed action during a normal year would average about 29,600 acre-feet (see Table 4-1).



**Page 2-5**

**Response:** Data from continuous EC recorders at the DMC terminus and the SJREC canal intakes are transmitted via telemetry to Reclamation and the SJREC in real time. EC is measured on an hourly basis at the DMC and automatically posted on Reclamation's web site. EC is measured at 15-minute intervals at the SJREC canal intakes. Data from the EC recorders at the MWA and James Irrigation District (JID) are downloaded on monthly intervals by consultants to the MPG and JID.

It is the responsibility of the monitoring entity, in this case SJREC, to notify the MPG that a violation of the EC criterion has occurred at the SJREC canal intakes.

**Page 2-7**

**Response:** This requirement is not considered part of "crop water" demand. It is part of normal farming practices to apply water to fallowed land for weed suppression. If weed suppression were not practiced, significantly greater effort would be required to bring the land back into production. In addition, if weed suppression is not practiced, the fallowed land could potentially be colonized by species listed under the federal Endangered Species Act or the California Endangered Species Act. If this were to happen, any efforts to bring the fallowed farmland back into production would require consultation with the appropriate federal or state resource agency.

**Page 3-19**

**Response:** Shallow MPG pumping is unlikely to cause significant seepage from the San Joaquin River or the San Joaquin River arm of the Pool because the MPG has no shallow wells in this area. The Herminghouse Agreement of 1959 specifically prohibits construction of any well with perforations shallower than 100 feet in FWD. Pumping of shallow MPG wells along the Fresno Slough arm of the Pool has minimal effect on seepage from the San Joaquin River arm because the cone of depression created by these wells is localized and does not extend very far from the vicinity of the wells.

**Figure 3-10**

**Response:** Groundwater elevations presented in the map are related to mean sea level. The data presented in this figure are from the spring of 1999. When interpreting groundwater elevation contour maps developed by DWR, it is important to be aware that water level data from wells of varying depths are combined to create the contour maps. In the case of the Madera Groundwater Basin contour map shown on Figure 3-10, groundwater levels measured in composite wells east of the Chowchilla Bypass are lower than levels measured in shallower wells. This causes the

cone of depression shown on the contour map to appear deeper than it actually is.

**Page 4-1**

**Response:** The referenced paragraph is a general discussion illustrating the interrelatedness of responses of the primary resource areas discussed in the EIS. The paragraph has been edited to make it clear that this is an illustrative example.

None of the wells planned to be used by the MPG are within the boundaries of Madera County. All of the MPG wells, with the exception of five wells in FWD, are located within Fresno County. FWD has agreed not to pump the five wells located in Madera County for exchange with Reclamation. FWD has also agreed to notify Madera County if it elects to resume pumping of these wells for other purposes. The County's groundwater ordinance, Ordinance No. 573B, includes restrictions on transfer pumping only from some wells located within Madera County and has no application to wells outside of the County.

**Page 4-2**

**Response:** As discussed in Section 3.4.2.3 "Hydraulic Connection between Surface Water and Groundwater," available data indicate that there is no direct hydraulic connection between surface water in the Fresno Slough arm of the Pool and shallow groundwater in the vicinity of the MPG well field due to an unsaturated zone beneath this arm of the Pool. Seepage from the Pool in this area is therefore independent of pumping activities.

**Page 4-6**

**Response:** No change is required. The land fallowing alternative does not require any exchange with other users around the Pool. However, the analysis accounts for the fact that individual MPG members may choose to do exchanges with others. The value of 9,000 acre-feet represents the maximum amount of water that could be exchanged with others based on anticipated demand around the Pool.

**Page 4-17**

**Response:** The paragraph in question refers to water quality degradation of groundwater, not surface water. The surface water mixing model will be used to develop annual MPG pumping programs that do not cause surface water quality degradation in the Pool. Even if a direct hydraulic connection were to be reestablished between surface water in the Fresno Slough arm of the Pool and the underlying groundwater, this would still be a losing reach similar to the San Joaquin River arm. The direction of flow would be from the Pool to the shallow aquifer, and there would be no gradient to cause groundwater to flow to the Pool.

**Page 4-18**

**Response:** Transfer pumping conducted under this alternative would be accomplished using both shallow and deep wells. Therefore, some groundwater quality degradation would be expected to occur in both zones.

**Page 4-24**

**Response:** SJREC owns and operates the continuous EC recorders at their canal intakes. EC measurements are made on 15-minute intervals, and the data are transmitted via telemetry to the SJREC office in Los Banos. It is the responsibility of the SJREC to notify the MPG if a violation of the EC criterion occurs.



2003 SEP 30 P 12: 34

# MADERA IRRIGATION DISTRICT

12152 ROAD 28 1/4 • MADERA, CA 93637- 9199 • (559) 673-3514 • (559) 268-2483 • FAX (559) 673-0564

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MARK A. BLUM  
Legal Counsel

September 29, 2003

VIA FACSIMILE AND U.S. MAIL

David Young, Director  
Bureau of Reclamation South Central Area Office  
1243 N Street  
Fresno, CA 93721-1814

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Re: Comments on the Draft Environmental Impact Statement No. 01-81  
Mendota Pool 10-year Exchange Agreements

Dear Mr. Young:

The Madera Irrigation District (hereinafter "MID" or "District") has reviewed the subject document and hereby submits these comments on the Mendota Pool 10-year Exchange Agreement, EIS No. 01-81 (DEIS). The District delivers irrigation water to approximately 100,000 acres in Madera County. The District's growers along the western boundary of MID are already impacted by overdrafted groundwater conditions in western Madera County and any action that would exacerbate the groundwater overdraft west of the District would have a potential adverse impact on MID growers. In addition, the District is concerned about the overall water resources that are necessary to support the agriculture-based economy in Madera County.

## General Comments

- ❖ Monitoring and pumping data from the 2002 Mendota Pool pumping program are not included in the DEIS or used in the analysis of potential impacts. Representatives of the MPG assured Madera County representatives prior to the completion of the DEIS that the 2002 data would be included in the analysis. Failure to include all relevant 2002 data will render the final EIS deficient.
- ❖ The lack of monitoring data from 2002 results in a failure to identify subsidence that has significantly exceeded expectations and targeted maximums identified in prior environmental documentation.

- ❖ The DEIS states that there is no groundwater overdraft in the area, but this was not supported by data. Water-level hydrographs for the shallow aquifer (above the A-clay) indicate a lack of water-level recovery in recent years, coincident with heavier pumping of shallow wells by the MPG. In addition, the Mendota area is upgradient of and hydraulically connected to the Madera area, which is a well-known area of groundwater overdraft and is identified as such in the DEIR.  
(3)
- ❖ Pumpage of about 270,000 acre-feet of water by the MPB over a 10-year period would intercept water that would otherwise be available as recharge to locally overdrafted areas and likely increase the overdraft in the Madera area by an average of up to 27,000 acre-feet per year, which is not insignificant. The impact of removing a source of natural recharge for western Madera County is equivalent to pumping and exporting water from Madera County.  
(4)
- ❖ The DEIS references a "Settlement Agreement" which contains provisions for certain specified landowners in Madera County to be paid for impacts to groundwater levels and pumping costs. There are no mitigation provisions for ensuring compensation for all landowners whose groundwater levels and pumping costs are impacted.  
(5)
- ❖ The MPG has gradually begun to admit that much of their sustainable pumping is from shallow wells that tap seepage from the Mendota Pool. The DEIS doesn't address where this seepage would have otherwise gone, if it was not pumped by the MPG. It also does not adequately address the potential impact to Mendota Pool seepage rates that may result from shallow well pumping. The impact of the loss of about 270,000 acre-feet of excellent quality recharge in the Mendota area and western Madera County wasn't clearly addressed in the DEIS. Instead, the DEIS infers that there would be little short-term impact on the groundwater quality in areas east of the Fresno Slough. However, the long-term impact of the loss of the 270,000 acre-feet of recharge of good quality water on groundwater near and north of the San Joaquin River, particularly in Columbia Canal Co. and Newhall L&F lands in Madera County, wasn't addressed.  
(6)
- ❖ Part of the Appendix D (model descriptions) discussion is difficult to understand and not well substantiated, such as "the seepage factor." The clustering of wells whereby Central California Irrigation District (CCID) wells and the older City of Mendota wells were grouped together is inappropriate, when considering the cause of the past water quality degradation of the city wells, which was not due to CCID pumpage.  
(7)
- ❖ The preparers of the hydrogeologic parts of the DEIS weren't identified. A California certified hydrogeologist should stamp the reports and/or appendices.  
(8)
- ❖ Influences of rising water levels in Westlands Water District in recent years and agricultural drainage on the northeasterly gradient and movement of poor quality groundwater weren't discussed.  
(9)

- (10) ❖ It appears that the DEIS' own findings are inconsistent: on the one hand, the DEIS finds in several locations that the impacts are either individually or cumulatively significant, especially with respect to groundwater levels in and around the project area. For example, section 4.1.1.2 discusses long-term effects and concludes that "water levels in the area just north of the San Joaquin River branch of the Pool are being closely monitored because the potential for overdraft appears to be high." The DEIS also recognizes that "overdraft has been occurring in portions of western Madera County northeast of Mendota for decades." But then the DEIS concludes that the proposed action (pumping almost 270,000 acre-feet) would result in a less than significant impact to overdrafted portions of Madera County.
- (11) Furthermore, having concluded that there will be no impact or no long term effects, surprisingly, the DEIS then concludes that "if there is evidence that pumping is causing long-term overdraft" the Mendota Pool Group has agreed to reduce transfer pumping. These are inconsistent findings and statement. And where the DEIS concludes that "if there is evidence of incomplete recovery of groundwater levels between years, the amount of water pumped from the deep zone would be reduced in the following year to allow water levels to recover," we must conclude that the DEIS has not correctly evaluated the hydrogeologic data to support a "less than significant" impact conclusion.
- (12) Either the long-term effects of the pumping are not adequately known and therefore need further analysis, or the effects are known, in which case the effects cannot be dismissed as insignificant.

### Specific Comments

**Page 2-2** First sentence, last paragraph: "for a "normal" year in which 31,000 acre-feet would be pumped." Everywhere else in document the number is 31,600.

**Page 2-5** 2.1.1.4 – Monitoring Program, fourth bullet point: "Evaluate data from continuous EC recorders located at the DMC, the Exchange Contractors' intakes, and the MWA at regular intervals."

What is a "regular" interval?

It is unclear if that is consistent with 2.1.1.3 Program Design Constraints Bullet point 2: "Shut off MPG wells if electrical conductivity (EC) measurement at the Exchange Contractors' canal intakes exceed that of the DMSC by 90 umhos/cm for a period of three days or more?"

**Page 2-7** 2.1.2.2 Land Fallowing, fifth sentence: Fallowed land requires approximately 0.5 acre-foot of water per year for weed suppression activities."

We are not aware that this has been considered part of "crop water" demand by DWR or Bureau. If the Bureau agrees to this water requirement for fallow land, then revisions to a significant number of CVP water needs analyses and Water Management Plans will be required.

**Page 3-19** Last paragraph of 3.4.2.3 states: MPG pumping from the deep Zone is therefore unlikely to cause significant seepage from the San Joaquin River.

This section should also address potential seepage resulting from shallow zone pumping?

**Figure 3-10** These types of maps are somewhat misleading. Although it isn't stated, it is assumed the contours are for MSL. Groundwater in the 80's MSL depression is 80-100 feet deep.

Where as the 100 feet MSL contour NE of Madera, it's 240-250 feet to standing water.

**Page 4-1** Last paragraph "Drawdown due to pumping would also result in an increase in the hydraulic gradient, thereby increasing the flow of groundwater from outlying areas toward the Mendota pool.

This could be considered export of Madera County groundwater requiring a Madera County groundwater export permit.

**Page 4.2** 4.1.1.1 Second paragraph "There are no shallow water supply wells other than MPG wells within the study area. Therefore, short-term drawdowns caused by MPG shallow pumping during normal years would not cause water level impacts to other users.

It would cause water impacts if there is hydraulic continuity to the pool, thus requiring more surface water to the pool to "in essence" be pumped back into the pool.

**Page 4-6** 4.1.3 Under this alternative, a maximum of 9,000-acre feet per year could be exchanged with other users around their pool. "Could" should be changed to "would."

**Page 4-17** Second paragraph: The predicted salinity increase at the shallow MPG wells during the proposed action is considered a significant impact.



This would indicate potential long-term degradation in the Mendota Pool water quality.

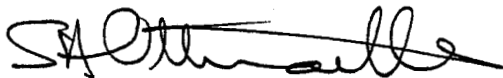
**Page 4-18** 4.3.4 Last sentence: This would probably cause additional groundwater quality degradation near the pool, not confined to "shallow" wells?

**Page 4-24** 4.4.13: 3 day rule on EC. Program doesn't indicate who is monitoring this daily or what is intended by the term "regular intervals".

In conclusion, the DEIS cannot support its conclusions that the project will result in less than significant hydrogeologic and other impacts in surrounding areas, including Madera County. Of critical importance is the inclusion of 2002 data in the analysis of all potential impacts. Unless there are significant corrections made to the EIS in accordance with these and other comments, it is likely that the EIS will be considered deficient.

Thank you for the opportunity to comment on this important environmental documentation process. We look forward to assisting the Bureau and the project proponent in identifying all of the potential impacts associated with the project.

Sincerely yours,



Stephen H. Ottemoeller  
General Manager

Cc Madera County  
San Joaquin River Exchange Contractor Authority  
Friant Water Users Authority



## **Response to Comments from Madera Irrigation District**

### **Introduction**

**Response:** Reclamation is cognizant of the concerns of Madera Irrigation District (MID), particularly with regard to groundwater overdraft in western Madera County. Reclamation must balance these concerns with its contractual obligations to provide CVP water to agricultural users through facilitation of the efficient delivery and reallocation of water for environmental and economic benefits as authorized by the Central Valley Project Improvement Act. Reclamation will take the concerns of MID into consideration in its review and decision making process. Should there is a significant impact to MID groundwater, Reclamation may consider disapproving the proposed action.

### **General Comments**

#### **Paragraph 1**

**Response:** See response to General Comment 1 from Madera County (page F-121).

#### **Paragraph 2**

**Response:** See response to General Comment 2 from Madera County (page F-121).

#### **Paragraph 3**

**Response:** See response to Specific Comment paragraph 5, no. 2 from the SJREC (page F-74).

#### **Paragraph 4**

**Response:** See response to Specific Comment paragraph 5, no. 3 from the SJREC (page F-75).

#### **Paragraph 5**

**Response:** See response to General Comment 5 from Madera County (page F-121).

#### **Paragraph 6**

**Response:** See response to Specific Comment paragraph 5, no. 4 from the SJREC (page F-75).

#### **Paragraph 7**

**Response:** See response to Specific Comment paragraph 5, no. 5 from the SJREC (page F-75).

**Paragraph 8**

**Response:** See response to Specific Comment paragraph 5, no. 1 from the SJREC (page F-74).

**Paragraph 9**

**Response:** See response to KDSA Overall Comment 6 from the SJREC consultant (page F-77).

**Paragraph 10**

**Response:** See response to Specific Comment paragraph 2 from the SJREC (page F-69).

**Paragraph 11**

**Response:** See response to Specific Comment paragraph 2 from the SJREC (page F-69).

**Paragraph 12**

**Response:** See response to Specific Comment 4 from the SJREC (page F-74).

**Specific Comments**

**Page 2-2**

**Response:** See response to Specific Comment Page 2-2 from Madera County (page F-122).

**Page 2-5**

**Response:** See response to Specific Comment Page 2-5 from Madera County (page F-122).

**Page 2-7**

**Response:** See response to Specific Comment Page 2-7 from Madera County (page F-123).

**Page 3-19**

**Response:** See response to Specific Comment Page 3-19 from Madera County (page F-123).

**Figure 3-10**

**Response:** See response to Specific Comment Figure 3-10 from Madera County (page F-124).

**Page 4-1**

**Response:** See response to Specific Comment Page 4-1 from Madera County (page F-124).

**Page 4-2**

**Response:** See response to Specific Comment Page 4-2 from Madera County (page F-124).

**Page 4-6**

**Response:** See response to Specific Comment Page 4-6 from Madera County (page F-124).

**Page 4-17**

**Response:** See response to Specific Comment Page 4-17 from Madera County (page F-124).

**Page 4-18**

**Response:** See response to Specific Comment Page 4-18 from Madera County (page F-125).

**Page 4-24**

**Response:** See response to Specific Comment Page 4-24 from Madera County (page F-125).

**Conclusion**

**Response:** Reclamation believes that the data that were available at the time that the draft EIS was prepared support the analyses and interpretation presented in the document. Additional data and conclusions from the 2002 Annual Report have been incorporated into the final EIS, as appropriate.



ALISO WATER DISTRICT  
10302 Avenue 7 1/2  
Firebaugh, California 93622  
(559) 659-1483

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FRESNO CA

February 13, 2004

2004 FEB 23 P 1:42  
Ms. Sheryl Carter  
U.S. Bureau of Reclamation  
1243 N Street  
Fresno, Ca. 93721-1813

*Mendota Pool Group*  
KEYWORD  
FILE CODE  
*ENV 600/WTR-4.00*

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4/4		
4/1		
DATE ACTION TAKEN		
COPIES TO		

Re: Mendota Pool Group Draft E I S

Dear Sheryl:

The Aliso Water District is comprised of more than 25,000 acres of diversified farming in Western Madera County. Most of the district acreage lies within the scope of work of the Mendota Pool Group Draft E I S. The Aliso Water District received a copy of the draft responses from Geomatrix with the Mendota Pool Group dated January 7, 2003 and stamped dated January 8, 2004 from the Exchange Contractors in response to comments submitted by the Exchange Contractors and Newhall Land and Farming dated September 25, 2003 regarding the Mendota Pool Group's 10 year draft E I S. The Aliso Water District concurs with the concerns expressed by the San Joaquin River Exchange Contractors and Newhall Land and Farming and wants to see these issues addressed. We are also submitting comments from Mr. Ken Schmidt dated February 6, 2004, which we feel should be addressed in the final E I S.

Please contact me if you have any questions or comments

Sincerely,



Roy Catania  
President

*Rec'd*  
Enclosure

## MEMO

To: S. Chedester, SJRECWA  
R. Catania, Newhall L&F

From: Ken Schmidt

Date: February 6, 2004

Topic: MPG 10-Year DEIS Draft  
Response to Comments

1. Although the draft response clarifies a number of issues, several important issues were not addressed. One of the most important is the lack of mitigation of the interception of good quality recharge, much of which would otherwise move into Madera County. This is a highly significant long-term impact on groundwater beneath the Columbia Canal Co. and Newhall L&F.
2. Water levels are declining in the area, and are not indicated to have been stable, except in some wells near or adjacent to sources of recharge. January 2004 water-level measurements indicate continuing declines, even without MPG transfer pumping. This and previous declines are an indication of groundwater over- draft. Adding to this overdraft in a critically overdrafted basin wasn't addressed or mitigated in the DEIS or the draft responses to comments.



3. The response suggests that pool seepage is only a small part of the water pumped from MPG wells, but this conclusion was not substantiated, and is not supported by actual hydrogeologic data. Both water-level elevations and groundwater quality unequivocally indicate that much of the water pumped by MPG wells is from pool seepage. Recharge from this seepage would have otherwise been available to other pumpers in the area.
4. There is clear evidence that the shallow groundwater along the San Joaquin River branch of the pool is hydraulically connected to water in the pool. The response indicates this that is insignificant, citing out-of-date general reports, as opposed to using actual monitoring data and elevations (such as for the Newhall L&F shallow monitor wells). Even if the MPG wells in this area are deep, this still increases seepage, due to increased downward head gradients. There is no indication that the A-clay is impermeable, rather it functions as a "leaky" confining bed, and is locally missing.



**Response to Comments from  
Aliso Water District**

The 60-day public comment period on the draft EIS closed on September 30, 2003. Aliso WD did not submit comments on the draft EIS during the public comment period. However, Reclamation acknowledges the concerns of Aliso WD and has responded to their comments in the following paragraphs.

**Comment 1**

**Response:** Please see response to SJREC letter (2/10/2004), Comment 1 (page F-109).

**Comment 2**

**Response:** Please see response to SJREC letter (2/10/2004), Comment 2 (page F-110).

**Comment 3**

**Response:** Please see response to SJREC letter (2/10/2004), Comment 3 (page F-111).

**Comment 4**

**Response:** Please see response to SJREC letter (2/10/2004), Comment 4 (page F-112).





# GRAVELLY FORD WATER DISTRICT

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1836 West Fifth Street, Madera, CA 93637 (559)674-5581

February 19, 2004

FEB 23 P 1:45

Mr. Michael Jackson, Dep. Area Mgr.  
South-Central Area Office  
U.S. Bureau of Reclamation  
1243 N Street  
Fresno, CA 93721

Re: Mendota Pool Group - Ten year DEIS Draft Response to Comments

Dear Mr. Jackson:

This is to advise that the Gravelly Ford Water District concurs with the conclusions and supports the position of the San Joaquin River Exchange Contractors Water Authority with regard to the "response to comments of the Mendota Pool Group 10 year DEIS Draft."

More particularly, the following significant issues are still lacking adequate responses and/or mitigation in the DEIS process:

1. The ongoing and continuing overdraft in the area is in a critically overdrafted basin and will be compounded by the MPG pumping.
2. Groundwater pumping near or directly adjacent to the Pool intercepts good quality recharge water which would otherwise move into Madera County.
3. The evidence is clear that much of the water pumped by the MPG wells is pool seepage as a result of the hydraulic connection between the groundwater and the water in the pool.

This proposed project needs to be put on hold until these issues are resolved to the satisfaction of the affected parties.

Sincerely,

Don Roberts  
Manager

cc: Madera County Board of Supervisors  
SIRECWA  
MPG

KEYWORD		
FILE CODE ENV-600		
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COPY	ACTION	SUPNAME & DATE
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DATE ACQUIRED		
COPIES TO		



**Response to Comments from  
Gravelly Ford Water District**

The 60-day public comment period on the draft EIS closed on September 30, 2003. Gravelly Ford WD did not submit comments on the draft EIS during the public comment period. However, Reclamation acknowledges the concerns of Gravelly Ford WD and has responded to their comments in the following paragraphs.

**Comment 1**

**Response:** Please see response to SJREC letter (2/10/2004), Comment 2 (page F-110).

**Comment 2**

**Response:** Please see response to SJREC letter (2/10/2004), Comment 1 (page F-109).

**Comment 3**

**Response:** Please see response to SJREC letter (2/10/2004), Comment 4 (page F-112).

